Comments on the QMP for BNC Engineering, LLC, PRPs contractor for the Falcon Refinery Superfund Site.

1. [1.0 - QMP ID Form (p. 1), Signature Page (p. 2), Appendix A organizational chart, various places in the text]   On the ID Form and on the Signature Page a Bob Chapin is given for Quality Control, while James E. Blackwell, Jr. is given in the Organizational Chart for the BNCQAM.   How do these roles differ and why is the president of the company serving as a QAM?   The text of the QMP does not discuss the role the person for Quality Control.   One recommendation would be for Mr. Chapin to serve as a QAM for the specific project and Mr. Balckwell to serve as a company wide QA manager. This would allow Mr. Blackwell to mediate any QA/QC disagreements between the project specific QAM and the Project Coordinator or On-Site Manager.   Somewhere in the text of the QMP there should be a discussion of the roles and authorities that each person on the Organization Chart has with regard to both the project and corporate QA program.   These roles should include, at a minimum, preparation and periodic review (and update if necessary) of this QMP; preparation, approval, review, and update of any QAPPs and SOPs; conduct, documentation, taking corrective action, and resolution of issues stemming from any assessments (including data validation and verification); setting standards, making requests, placing orders and acceptance for any goods and services acquired by the company for any subject project.   The QAM for the project needs to be independent of the management of the specific project.   The QAM needs to be able to consult with the Project Coordinator or On-Site Manager while reporting to a person at least one level higher that the Project Coordinator.

2. Somewhere in the text there needs to be a statement on the lifetime of any QMP and QAPP.   It is an Agency policy that QMPs and QAPPs need to be reviewed annually and rewritten every five (5) years.   At the time of the annual review, a letter needs to be sent attesting to the review.   If changes are needed and minor and of limited nature, the changes can be presented and discussed in the letter.   For more extensive changes, a new document will need to be written.   In either case, new signed Signature pages need to be forwarded with the letter to the Agency.

3. For contractors working for PRPs, the EPA RPM or EPA OSC, the PRPs, and/or PRP representatives are required to review and approve reports and documents prepared by the contractor for the site.   The QMP and QAPP are some of these documents.   This QMP should discuss their roles and their activities and give guidance on when changes in the QMP/QAPP need to be returned for preparation of new documents and new approvals.

4. This QMP should specify that any subcontractor or internal organization involved in the collection of environmental data also have a Quality System that complies with the Agencies guidelines. This usually includes drilling companies, laboratories, or monitoring services.   BNC is responsible for assuring the quality of their QA programs. This QMP should indicate who reviews this program and its QMP, and assures that the system operates as stated.

5.	[Section 5.7 Information Management, p.11] BNC needs to describe the process for developing, evaluating, installing, testing, using, maintaining, controlling, and documenting computer hardware and software. This can be very brief for off-the-shelf products such as Microsoft software or Laptop PCs. Much more will be needed for specialized software, such as for air-dispersion models or ground-water models. Of special interest will be procedures for testing specialized software for its intended use. A discussion is also needed indicating the personnel responsible for all or parts of the above mentioned software and hardware issues. Computer security procedures need to be discussed.

6.	BNC needs to discuss their data management program(s). This should be relatively brief and limited to company-wide or project-wide activities. Many of these items are discussed in more detail in QAPPs. Things to consider here are use of Electronic Data Deliverables (EDDs), formats for transfer of data within the company and to/from the company (e.g., lab data can be delivered on paper and/or on E-mailed spreadsheets), and whether data should be sent for validation/verification prior to delivery to the project coordinator. There should be mention of procedures for insuring the integrity and security of the data.